



interior design **PROTECTION** consulting

*The nation's leading advocate protecting designers' livelihoods*  
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March 11, 2013

The Honorable Hugh Crawford, Chair  
Michigan House Regulatory Reform Committee  
Anderson House Office Building  
Lansing, MI 48933

Re: **SUPPORT** HB 4378 – Repeal Interior Design Registration

Dear Chairman Crawford:

On behalf of the below-listed trade associations' Michigan members, we'd like to outline our **strong support** for HB 4378 and ask you to pass this bill.

Designer Society of America ([www.dsasociety.com](http://www.dsasociety.com))  
Interiors by Decorating Den ([www.decoratingden.com](http://www.decoratingden.com))  
Foodservice Equipment Distributors Association ([www.feda.com](http://www.feda.com))  
Foodservice Consultants Society International ([www.fcsi.org](http://www.fcsi.org))  
Manufacturers Agents' Assoc. of the Foodservice Industry ([www.mafsi.org](http://www.mafsi.org))  
North American Association of Food Equipment ([www.nafem.org](http://www.nafem.org))

1. **Need.** The proponents claim that registration is needed so that the public can determine who they should hire. While the proponents are certainly entitled to their opinion, they are not entitled to their own set of facts.
  - There is **NO** public outcry from consumers indicating that they are confused about interior design services. The public does not lack the ability to make informed choices about who they retain for design services; they are quite capable of reviewing portfolios and websites, interviewing potential designers, checking references and checking private certification credentials to determine what level of designer fits their project.
  - The registration act came about *exclusively* through the efforts of industry insiders, not as a result of public demand or legislative determinations that registration is necessary for the public good.

2. **Public safety.** The only legitimate reason to regulate a profession is to protect the public. However...
  - There is not a shred of evidence to warrant a conclusion that non-registered interior designers place the public in any form of jeopardy.
  - 13 state agencies have studied the need for interior design regulation and without exception, all recommended against any type of regulation on the basis that it would add absolutely nothing to protect the public beyond that which is already in place.
3. **Recognition.** Absent any genuine harm to the public, the legislature should not regulate occupations for the sole purpose of providing a state-sanctioned marketing advantage for a small special interest group while placing the clear majority who practice at an unfair competitive disadvantage.
4. **Redundancy.** The interior design title act merely duplicates a process that is already in place. Interior designers who wish to be distinguished from their peers already have a method to do so; they may take the NCIDQ (or one of several other certifications such as LEEDS, C.A.P.S, NKBA, DSA, CQRID, etc.), and are then free to publicize that distinction. That distinction is notable, well-recognized and does not require that others be placed at an unfair competitive and economic disadvantage.
5. **Trojan horse.** Historically, once a “foot in the door” has been established through enactment of a seemingly innocuous registration, the proponents inevitably come back in a few years to try and expand it into a full-blown practice act that would put many honest, hard working designers out of business. Several attempts to pass practice acts since the registration was enacted have already transpired in Michigan, including SB 1325, SB 1326, SB 1327 from 2012.

No legitimate governmental interest is served by the interior design registration. We urge you to **PASS** HB4378 and repeal the interior design registration.

Respectfully submitted,

*Patti Morrow*  
President